Remarks

The Examiner has maintained his view that the pending claims 1 to 4, 6 to 8 and 10 to 15 are unpatentable under 35 U.S.C. 103(a) over Miloslavsky (US5915012) in view of Goecke (US6175564).

Applicants have reconsidered the Examiner's rejection of the pending claims, particularly taking into account the "Response to Arguments" section of the Office Action.

However, Applicants have not amended the claims on this occasion, but make the following observations both in direct response to the continued rejection of the claims and in preparation for an Appeal. As such, no new issues are raised and this response should be entered and fully considered.

Primary reference Miloslavsky teaches a network of contact centers having a centralized (network level) routing system common to all the contact centers. The centralized, network level routing system comprises a stat server, a routing server and a database. When a call is received at any contact center, a CTI server at that contact center sends the call to the routing server. The routing sever obtains previous order information, for example, relating to the received call from the routing system database and agent status information (for all the various contact centers) from the stat server. The stat server stores *historical* data. The stat server is updated periodically by each contact center with agent statuses. The routing server then determines from the periodically updated (i.e. historical) agent status information contained in the stat server the best available agent and routes the received call to that agent in whichever one of the many contact centers the agent resides. The routing server also passes on the order data etc. obtained from the database to the selected agent. The Examiner concedes that Miloslavsky teaches such a centralized routing system that is common to all contact centers. Therefore, there is nothing controversial in the above summary of the disclosure of Miloslavsky nor anything that should lead to a disagreement between the Applicants and the Examiner about what Miloslavsky teaches. One major disadvantage of the above

system disclosed by Miloslavsky is that, if any of the centralized routing system boxes (stat server, routing server or database) fail, the whole system of routing of received contacts to agents fails with it.

Second primary reference, Goecke, has Miloslavsky as a common and first named inventor, but is referred to as Goecke for convenience. This discloses contact centers where the routing system is local to each contact center. However, the routing system local to each contact center is identical in its arrangement to that of the network level routing system of Miloslavsky, comprising the same set of boxes, namely a stat server, a routing server and a database, each performing the same function as in Miloslavsky, but for its local contact center.

The Examiner argues that it would have been obvious to modify Miloslavsky to employ local routing systems as taught by Goecke to provide a system that can route a contact received at any contact center in a network of contact centers to a best available agent in any of the networked contact centers. However, in order for a routing system local to one of the contact centers of this combination of prior art references to route a call received at its local contact center to a 'best available agent', the local stat server of each such local routing system must receive from all contact centers data comprising the statuses of agents at all of said centers. Thus, each local status server must be periodically updated with agent statuses from all contact centers. This represents a huge duplication of effort and use of bandwidth in the network connecting the contact centers to periodically update the local stat servers of each contact center with agent statuses for all such contact centers.

The present invention as claimed is quite distinct from this combination for the following reasons which the Examiner does not appear to have ever appreciated throughout the whole of the examination procedure to date.

The present invention on receiving a contact at one of the network of contact centers sends a *reservation request* to each contact center in the network including itself. The source contact center then receives from one or more (not necessarily all) of the contact centers (including itself) information for *an agent* with a specified relative intrinsic value. Note that the information provided by any responding contact center

does not comprise data providing the statuses of all agents at such contact center, but merely information for an agent at that contact center with a specified relative intrinsic value. The information is therefore very specific being responsive to the reservation request requesting that the other contact centers, in effect, identify a 'best available agent' at each said contact center. As such, it is implicit that the present invention uses real time information in contrast to the historical agent status data stored in the local stat servers of the Miloslavsky and Goecke combination, and is small in bandwidth since it identifies a value of the specified intrinsic and an agent ID in contrast to the large volumes of agent status data that must be provided periodically to the local stat servers of the proposed combination. Furthermore, there is no duplication of data in the present case since each contact center that responds to the reservation request inherently processes the reservation request in respect of only its own agents and not those of other contact centers. In the combination of Miloslavsky and Goecke, the local stat servers must each know the statuses of all agents in other contact centers and must then process this large amount of data to identify a best available agent in one of said many contact centers. The suggested combination is therefore very inefficient in network usage through requiring large amounts of data to be sent periodically to each local stat server and inefficient in time taken to identify a best available agent because, for each received contact, a local stat server must process all of said stored data comprising the statues of all agents of the network of contact centers. Furthermore, the data used to identify a 'best available agent' is always, by its very nature (i.e. historical), out of date. The only way to reduce the 'out of datedness' of the agent status data for all contact centers periodically communicated to each of the local stat servers would be to decrease the period between updates, but this would greatly increase the burden on the systems communication links. One of ordinary skill in the art would not seriously contemplate attempting to provide each local stat server with real time status information of the status of all contact center agents upon receipt of a new contact for the very obvious reason that the delay caused by providing such a quantity of real time information for each new contact would bring the system to a standstill. Thus, this demonstrates one significant difference of the claimed invention over the combination of Miloslavsky and Goecke in that, in the claimed invention, a contact center returns low bandwidth, real time comprising information for *an agent* with a specified relative intrinsic value in response to a *reservation request* initiated

by receipt of a new contact at one (a source) of the contact centers and not the statuses of all agents at that contact center. It simply cannot be contended that the combination of Miloslavsky and Goecke teaches or suggests anything other than periodically communicating to each local stat server the statuses of all agents from all of the contact centers in order to enable a local contact center to identify a best available agent.

The combination of Miloslavsky and Goecke does not teach the use of low bandwidth, real time information in identifying a best available agent, which is at least implicit to the claim language and therefore does not represent a submission based on features not contained in the claims. One skilled in the claim will know inherently from the claim language that the feature of information for *an agent* with a specified relative intrinsic value comprises real time information which I low in bandwidth (comparatively speaking). The combination of Miloslavsky and Goecke requires large amounts of data to be communicated and duplicated to each local stat server and requires significant processing capability at each local stat server/routing server to process all agent status data to identify a best available agent.

In view of the foregoing, favorable reconsideration of the application is respectfully requested.

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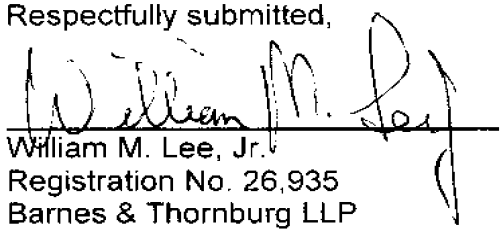
Respectfully submitted,



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